

Dear Mr. Doug Melancon:

During our phone conversation today, I asked you to provide information about a reported event (release of 1600 pounds of material to concreate containment of which 1200 pounds was 1,4-dichloro-2butene and 400 pounds of 3,4-dichloro-1butene) from E.I. DuPont de Nemours & Pontchartrain Works in LaPlace, LA on June 17, 2015.

If you plan to claim any information as confidential business information, please call me so that we can discuss options prior to you sending the information. DO NOT EMAIL!

Please provide the following information for the noted event:

1. Provide the name, title, email, phone number and mailing address for the person to whom formal correspondence should be sent regarding the release.
2. Who owns and/or operates the location where the event occurred (your "facility")?
3. Briefly describe the facility, e.g. discuss what activities take place on-site and what substances are produced, processed, handled or stored on-site. Further, describe all equipment, structures, buildings, and process units found at the facility where the event took place.
4. Provide a detailed description and timeline of the event. Include the best known start time and duration of the incident and the timeline for any emergency response.
5. Have there been any investigations or audits of the event? Are investigations or audits pending? Who performed the investigations or audits? Provide a copy of the reports, audits, or any other analysis describing the causes and consequences of the event, including all draft reports and/or draft audit results.
6. What measures have been taken to address the findings, conclusions or recommendations of the investigations or audits?
7. Are there any findings, conclusions, or recommendations that have not been addressed fully, and if so, what measures remain to be taken, and what is the expected timeline for implementing those measures?
8. What process units were involved in the event? Provide a brief process description for the processes involved in the event. Please also provide a process flow diagram. What type of training do your employees receive before any work is performed at the facility? Send records of training and your standard operating procedures for the employees involved in the reported release aforementioned.
9. What specific substances were released during the event, including the estimated or known amounts of each substance? Include all air contaminants that were released during the event, even those materials with release amounts below the reportable quantity.
10. What is the initial best known cause or root cause of the event? Were there any additional contributing factors that you are aware of?
11. Was there any property or equipment damage, both on-site and off-site, that resulted from the event? If yes, explain.
12. Were there any injuries attributed to the event? If yes, explain.

13. Did you, or anyone else, issue any evacuation or shelter in place orders as a result of the event for your facility or surrounding community?
14. What emergency response measures were taken, by you or anyone else, to stop and/or to minimize hazards from the event?
15. Did the facility perform any air monitoring during or after the event, including any routine monitoring? If so, then please provide a summary of the results.
16. Has the state environmental agency (LDEQ) conducted an inspection or requested information regarding the event? If so, please provide the name and contact information for each agency person who conducted an inspection or requested information.
17. Please provide any documents associated with the identification of hazards at your facility.
18. What is the SIC or NAICS, FRS and/or AFS number/code for the facility where the event occurred? Provide, as applicable, the Louisiana Department of Environmental Quality Air registration, permit, facility, equipment and regulated entity numbers associated with the site/process where the incident occurred.
19. Does your facility have a Risk Management Program? Did the event take place at a RMP covered process?

If you have any questions, please feel free to contact me at [[HYPERLINK "mailto:medellin.jake@epa.gov"](mailto:medellin.jake@epa.gov)] and 281-983-2165. Please provide the above requested information by close of business (COB) on June 17, 2015.

Appointment

From: Coleman, Sam [coleman.sam@epa.gov]
Sent: 12/14/2015 1:39:30 PM
To: Lassiter, Penny [Lassiter.Penny@epa.gov]

Subject: Accepted: NATA Chloroprene Discussion with Denka/ DuPont
Location: RTP-E201-Max50/RTP-Bldg-E; RTP-OAQPS-919-541-4486-SPPD/Phone-Line/RTP-OAQPS-BLDG-C

Start: 12/15/2015 6:00:00 PM
End: 12/15/2015 7:00:00 PM
Show Time As: Tentative

Recurrence: (none)

Appointment

From: Johnson, Tanya [Johnson.Tanya@epa.gov]
Sent: 12/10/2015 1:31:44 PM
To: Lassiter, Penny [Lassiter.Penny@epa.gov]; Rimer, Kelly [Rimer.Kelly@epa.gov]; Sasser, Erika [Sasser.Erika@epa.gov]; Stenger, Wren [stenger.wren@epa.gov]; Blevins, John [Blevins.John@epa.gov]; Coleman, Sam [Coleman.Sam@epa.gov]
CC: Hunt, Virginia [Hunt.Virginia@epa.gov]
Subject: Discuss Region 6 Action Plan Regarding Chloroprene Issue at Denka
Location: RTP-OAQPS-D210A-SPPD-IO-only/RTP-OAQPS-BLDG-D/Restricted; RTP-OAQPS-919-541-4332-SPPD/Phone-Line/RTP-OAQPS-BLDG-C
Start: 12/10/2015 6:30:00 PM
End: 12/10/2015 7:00:00 PM
Show Time As: Tentative

Message

From: Stenger, Wren [stenger.wren@epa.gov]
Sent: 11/30/2015 10:53:45 PM
To: Coleman, Sam [Coleman.Sam@epa.gov]; Blevins, John [Blevins.John@epa.gov]; Blanco, Arturo [Blanco.Arturo@epa.gov]; Gray, David [gray.david@epa.gov]; Gilrein, Stephen [gilrein.stephen@epa.gov]; Smith, Rhonda [smith.rhonda@epa.gov]; Luthans, William [luthans.william@epa.gov]; Taheri, Diane [Taheri.Diane@epa.gov]
CC: Williams, Odessa [Williams.Odessa@epa.gov]
Subject: RE: DuPont facility in Laplace, LA

I am available at various times this week except Friday.

Sam, do you want me to send a meeting invitation for all?

WREN STENGER

Director
Multimedia Planning and Permitting Division
EPA Region 6 Dallas, Texas
214.665.6583

From: Coleman, Sam
Sent: Monday, November 30, 2015 3:40 PM
To: Blevins, John; Blanco, Arturo; Gray, David; Stenger, Wren; Gilrein, Stephen; Smith, Rhonda; Luthans, William; Taheri, Diane
Cc: Williams, Odessa
Subject: RE: DuPont facility in Laplace, LA

We should get together later this week to discuss the strategy on this.

Samuel Coleman, P.E.,
Deputy Regional Administrator

coleman.sam@epa.gov

214.665.2100

214.665.3110 Direct

214.789.2016 Cell



From: Blevins, John
Sent: Monday, November 30, 2015 2:08 PM
To: Coleman, Sam; Blanco, Arturo; Gray, David; Stenger, Wren
Cc: Gilrein, Stephen
Subject: FW: DuPont facility in Laplace, LA

FYI...we would like to reach out to OECA but wanted to touch base with all of you prior to doing that...

John



From: Gilrein, Stephen

Sent: Tuesday, November 24, 2015 3:27 PM

To: Blevins, John

Subject: FW: DuPont facility in Laplace, LA

We need to follow-up with OECA. This is very troubling. We need a timely plan forward.

From: Yurk, Jeffrey

Sent: Tuesday, November 24, 2015 12:36 PM

To: Gilrein, Stephen

Subject: DuPont facility in Laplace, LA

Steve: I wanted to make you aware that there is a potential for cancer risk above traditional levels of concern to the communities surrounding the DuPont facility in Laplace, LA from releases of the hazardous air pollutant chloroprene. Potential cancer risk modeled at the census block level (likely an EJ community) in the soon to be released NATA study, shows cancer risk to be 2×10^{-3} . A cancer slope factor for chloroprene was finalized and released by EPA in March of 2011, prior to that chloroprene was not listed as a carcinogen. RTP just completed risk modeling utilizing the 2011 National Emissions Inventory. The NATA is scheduled to be released on December 15th. The primary uncertainties around the risk assessment are the source-specific emissions reported by the facility calculated utilizing engineering calculations. The DuPont facility does appear to be operating below their permit limit. They are permitted to release 191 tons and are releasing about 125 tons. No other sources of chloroprene within the Region report emitting even one ton.

Jeff

p.s. I can conduct a finer scale modeling if necessary to project risk at the neighborhood level. It would probably take me until mid-January to complete.

Message

From: Blevins, John [Blevins.John@epa.gov]
Sent: 11/30/2015 8:07:52 PM
To: Coleman, Sam [Coleman.Sam@epa.gov]; Blanco, Arturo [Blanco.Arturo@epa.gov]; Gray, David [gray.david@epa.gov]; Stenger, Wren [stenger.wren@epa.gov]
CC: Gilrein, Stephen [gilrein.stephen@epa.gov]
Subject: FW: DuPont facility in Laplace, LA

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Jeff

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Message

From: Gray, David [gray.david@epa.gov]
Sent: 12/11/2015 10:28:09 PM
To: Stenger, Wren [stenger.wren@epa.gov]; Coleman, Sam [Coleman.Sam@epa.gov]; Curry, Ron [Curry.Ron@epa.gov]
Subject: NATA LaPlace Communication Strategy v2.docx
Attachments: NATA LaPlace Communication Strategy v2.docx; ATT00001.txt

Here is the latest r6 comm plan for LaPlace. More to come but wanted you to have the latest version. It will go to Janet on Monday.

David

Message

From: Stenger, Wren [stenger.wren@epa.gov]
Sent: 12/11/2015 10:05:20 PM
To: Gray, David [gray.david@epa.gov]; Coleman, Sam [Coleman.Sam@epa.gov]; Stenger, Wren [stenger.wren@epa.gov]
Subject: RE: update for Janet --
Attachments: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 10 2015.docx

This is the latest draft Action Plan.

WREN STENGER

Director

Multimedia Planning and Permitting Division

EPA Region 6 Dallas, Texas

214.665.6583

From: Gray, David
Sent: Friday, December 11, 2015 3:48 PM
To: Stenger, Wren; Gray, David; Coleman, Sam
Subject: Fwd: update for Janet --

This doesn't include our LA plan which is being updated.

David

I'm attaching the latest draft rollout plan, fact sheet and Q&As for NATA (this does not include the Louisiana issues). These are all works in progress – particularly the Q&As.

Message

From: Gray, David [gray.david@epa.gov]
Sent: 11/25/2015 7:36:01 PM
To: Coleman, Sam [Coleman.Sam@epa.gov]
Subject: FYI

We had a WQ action at the facility in October. Bill is sending me a briefing paper that routed with the decision.

10/28/2015

Wednesday

Final approval of a petition

reissuance for DuPont Pontchartrain

(LaPlace, LA)

Region06/ OW

Type: Petition

DD Signature

MILESTONE DESCRIPTION: DuPont
needs this petition reissuance to continue
the disposal of hazardous waste via their
three injection wells so their plant can
continue to operate.

Message

From: Lassiter, Penny [Lassiter.Penny@epa.gov]
Sent: 12/11/2015 3:06:34 PM
To: Blevins, John [Blevins.John@epa.gov]; Stenger, Wren [stenger.wren@epa.gov]; Tsirigotis, Peter [Tsirigotis.Peter@epa.gov]; Smidinger, Betsy [Smidinger.Betsy@epa.gov]; Shinkman, Susan [Shinkman.Susan@epa.gov]
CC: Seager, Cheryl [Seager.Cheryl@epa.gov]; Harrison, Ben [Harrison.Ben@epa.gov]; Coleman, Sam [Coleman.Sam@epa.gov]; Starfield, Lawrence [Starfield.Lawrence@epa.gov]
Subject: RE: Draft 114 for Denka/Dupont

John,

Is there also a separate Action Plan that Reg. 6 is developing or is this it?

From: Blevins, John
Sent: Friday, December 11, 2015 9:49 AM
To: Stenger, Wren <stenger.wren@epa.gov>; Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>; Lassiter, Penny <Lassiter.Penny@epa.gov>; Smidinger, Betsy <Smidinger.Betsy@epa.gov>; Shinkman, Susan <Shinkman.Susan@epa.gov>
Cc: Seager, Cheryl <Seager.Cheryl@epa.gov>; Harrison, Ben <Harrison.Ben@epa.gov>; Coleman, Sam <Coleman.Sam@epa.gov>; Starfield, Lawrence <Starfield.Lawrence@epa.gov>
Subject: FW: Draft 114 for Denka/Dupont
Importance: High

Attached is the draft 114 letter...we are still fine tuning....please send you comments to Steve Thompson...we will work to have this ready for signature on the 17th...2 letters will go out- 1 to Dupont and 1 to Denka...again our goal is to gather existing data...I will look at cover letter today in detail...thanks for your help on this...

John



From: Thompson, Steve
Sent: Friday, December 11, 2015 8:40 AM
To: Blevins, John
Subject: Draft 114 for Denka/Dupont

Please send me any comments and we will work quickly to consolidate. I have attached the full 114 and also inserted the questions into the email below.

Questions:

Denka Performance Elastomers LLC shall submit the following information about its elastomers facility located in Laplace, Louisiana, within 30 days:

The Facility contains emission units that emit or have the potential to emit pollutants that are subject to requirements of the Clean Air Act (CAA). Accordingly, Denka must provide the following information for the Facility:

1. A scaled site plot plan drawing of the Facility and the area immediately surrounding the Facility. The plot plan should include the Chloroprene Unit, Permit No. 3000-V5, the Neoprene Unit, Permit No. 2249-V7, and the HCl Recovery Unit, Permit No. 206-V2 and containing the following:
 - a. Property lines on all sides, true north arrow orientation, and showing immediately adjacent streets or property names;
 - b. Buildings, structures, significant features and equipment areas on the plant property, with labels or a legend identifying each building, structure, feature or area; and
 - c. Labels or a legend identifying the locations and names of all air emission sources that emit **chloroprene** at the Facility, consistent with permit ID No. designations and names found in the Facility's above-referenced Title V air permits.
2. Provide up-to-date detailed process flow diagrams for all production processes and affected auxiliary support operations at the Facility (e.g., wastewater treatment, loading/unloading etc.), where chloroprene is an emitted pollutant. On the diagrams, using a key for clarity purposes, identify each of the units identified in response to question #1. The diagram must include all emissions units, continuous emissions monitoring systems ("CEMS"), continuous opacity monitoring systems ("COMS"), and all Air Pollution Control Equipment ("APCE"), labeled in a manner consistent with the Facility's LDEQ Air Permits.
3. Provide complete copies of air dispersion modeling studies or reports completed during calendar years 2011 through 2015, for air permitting or other emissions authorization, risk management plans, disaster prevention and release response planning, or episodic release reporting. Include as electronic attachments any emission source modeling spreadsheets developed and employed, plus input and output files in their native format from the modeling software or program used. In addition, please include the meteorological site location and the meteorological data utilized for the air dispersion modeling.
4. Provide all emission calculations of chloroprene that were prepared for LDEQ air permit applications and emission inventories in calendar years 2011 through 2015, including references or bases for emission factors and calculation methodologies used.
5. For any emission point where chloroprene is a pollutant, please list occurrences where the reported emission value to the emission inventory is within 2 % of the permitted allowable or the previous year's emissions inventory submittal. For these occurrences, provide an explanation of why the values are the so similar (e.g., is the previous years reported emissions used to estimate the future emission, does the methodology used to estimate emissions leave no room for inaccuracy, etc.).
6. Provide all usage threshold determinations and air release calculations for chloroprene from Toxic Chemical Release Inventory (TRI) reports for calendar years 2010 through 2014, including references or bases for estimating air releases, including estimation and calculation methodologies used.
7. Provide all measurements, engineering assessments, and calculations performed to determine the most recent TRE index value for any applicable MACT standard. Include any data, assumptions and procedures used for the engineering assessments.
8. Provide the most recent performance testing records required by the above referenced Title V air permits (Chloroprene Unit, Permit No. 3000-V5, the Neoprene Unit, Permit No. 2249-V7, and the HCl Recovery Unit, Permit No. 206-V2).
9. Provide the most recent submittal of any notification of compliance status used to comply with any applicable MACT standards.

Steve Thompson

Branch Chief
Air Enforcement Branch
Compliance Assurance and Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
214-665-2769
thompson.steve@epa.gov

Message

From: Stenger, Wren [stenger.wren@epa.gov]
Sent: 11/23/2015 11:28:14 PM
To: Curry, Ron [Curry.Ron@epa.gov]; Coleman, Sam [Coleman.Sam@epa.gov]; Gray, David [gray.david@epa.gov]; Ruiz, Thomas [Ruiz.Thomas@epa.gov]
Subject: FW: National Air Toxics Assessment (NATA) Data - Chloroprene Risk in LaPlace Louisiana
Attachments: NATA-Chloroprene risk111715.doc

Ron, Sam,

I mentioned this morning. HQs plans to release NATA in December. We have informed the state and HQs has worked directly with Dupont. Previously, EPA did not have a chloroprene risk number in IRIS, and now, the national air toxics assessment predicts risk of cancer from the chloroprene emissions from Dupont (Dupont Ponchartrain Works in La Place, Louisiana) is about 9 in 10,000. This is based on modeled emissions and an estimated emission.

Janet will be briefed this week and I just wanted to make you aware. The fact sheet attached is ours, but we expect to get more information from HQs...yet to receive.

David, you may also get information through XA channels.

WREN STENGER

Director

Multimedia Planning and Permitting Division

EPA Region 6 Dallas, Texas

214.665.6583

Message

From: Blevins, John [Blevins.John@epa.gov]
Sent: 12/11/2015 2:49:26 PM
To: Stenger, Wren [stenger.wren@epa.gov]; Tsirigotis, Peter [Tsirigotis.Peter@epa.gov]; Lassiter, Penny [Lassiter.Penny@epa.gov]; Smidinger, Betsy [Smidinger.Betsy@epa.gov]; Shinkman, Susan [Shinkman.Susan@epa.gov]
CC: Seager, Cheryl [Seager.Cheryl@epa.gov]; Harrison, Ben [Harrison.Ben@epa.gov]; Coleman, Sam [Coleman.Sam@epa.gov]; Starfield, Lawrence [Starfield.Lawrence@epa.gov]
Subject: FW: Draft 114 for Denka/Dupont
Attachments: Denka Draft 114 Request Letter Template - Dec 2015_ST.doc

Importance: High

Attached is the draft 114 letter...we are still fine tuning....please send you comments to Steve Thompson...we will work to have this ready for signature on the 17th...2 letters will go out- 1 to Dupont and 1 to Denka...again our goal is to gather existing data...I will look at cover letter today in detail...thanks for your help on this...

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7. Provide all measurements, engineering assessments, and calculations performed to determine the most recent TRE index value for any applicable MACT standard. Include any data, assumptions and procedures used for the engineering assessments.
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9. Provide the most recent submittal of any notification of compliance status used to comply with any applicable MACT standards.

Steve Thompson
Branch Chief
Air Enforcement Branch
Compliance Assurance and Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
214-665-2769
thompson.steve@epa.gov

Appointment

From: Johnson, Tanya [Johnson.Tanya@epa.gov]
Sent: 12/10/2015 1:31:44 PM
To: Lassiter, Penny [Lassiter.Penny@epa.gov]; Rimer, Kelly [Rimer.Kelly@epa.gov]; Sasser, Erika [Sasser.Erika@epa.gov]; Stenger, Wren [stenger.wren@epa.gov]; Blevins, John [Blevins.John@epa.gov]; Coleman, Sam [Coleman.Sam@epa.gov]
CC: Hunt, Virginia [Hunt.Virginia@epa.gov]
Subject: Discuss Region 6 Action Plan Regarding Chloroprene Issue at Denka
Location: RTP-OAQPS-D210A-SPPD-IO-only/RTP-OAQPS-BLDG-D/Restricted;
RTP-OAQPS-919-541-4332-SPPD/Phone-Line/RTP-OAQPS-BLDG-C
Start: 12/10/2015 6:30:00 PM
End: 12/10/2015 7:00:00 PM
Show Time As: Tentative

Call-in # 919-541-4332

POC: Penny Lassiter

Meeting needed today.

Message

From: Stenger, Wren [stenger.wren@epa.gov]
Sent: 12/10/2015 12:03:30 AM
To: Coleman, Sam [Coleman.Sam@epa.gov]; Edlund, Carl [Edlund.Carl@epa.gov]; McDonald, James [McDonald.James@epa.gov]
CC: Hansen, Mark [Hansen.Mark@epa.gov]; Crossland, Ronnie [Crossland.Ronnie@epa.gov]; McQuiddy, David [Mcquiddy.David@epa.gov]; Stenger, Wren [stenger.wren@epa.gov]
Subject: Dupont LaPlace ambient air monitoring

Sam, Carl, James,

After much discussion between Houston Lab, SF, and us, this is the option developed for ambient air monitoring. Sam, I gave you a heads up by phone just now on the cost. You suggested this was the same ballpark as TAGA and maybe TAGA would be a better approach. Ronnie is checking with the region that was scheduled to use the TAGA in January to see if we can bump them. In the meantime, here is the non-TAGA monitoring plan we developed.

Mobilize Superfund START contractor for conducting the air sampling and analyses work. Deploy composite samplers (summa canisters) to collect collocated (duplicate) samples at each of the two closest schools (Lady of Grace and Fifth Ward Elementary), one collocated crosswind location (School), one upwind location (River Parishes Hospital), and one field blank, for a total of 4 locations and 7 samples collected per day. Analyze for only chloroprene, using EPA Method TO15. This would involve collection and analysis of 108 summa samples with 24 hr turnaround. Costs for sampling at 4 locations for a 12 day period, and utilizing a private lab is the following:

EPA R6 START: \$ 100,000.00

EPA: \$5,000.00

Total= \$105,000.00

WREN STENGER

Director

Multimedia Planning and Permitting Division

EPA Region 6 Dallas, Texas

214.665.6583

Message

From: Curry, Ron [Curry.Ron@epa.gov]
Sent: 12/4/2015 5:56:14 PM
To: Rupp, Mark [Rupp.Mark@epa.gov]
CC: Coleman, Sam [Coleman.Sam@epa.gov]
Subject: FW: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 3 2015.docx
Attachments: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 3 2015.docx

Very early draft.

From: Stenger, Wren
Sent: Thursday, December 03, 2015 4:27 PM
To: Blevins, John; Seager, Cheryl; Edlund, Carl; Garcia, David; Gilrein, Stephen; Gray, David; Harrison, Ben; Hill, Troy; Honker, William; McDonald, James; Phillips, Pam; Smith, Rhonda; Taheri, Diane; Blanco, Arturo; Coleman, Sam; Curry, Ron
Cc: Crossland, Ronnie; Yurk, Jeffrey; Johnson, Lydia; Verhalen, Frances; Hansen, Mark; Casso, Ruben; Anderson, Israel; Runnels, Charlotte; Brown, James; McGee, Tomika
Subject: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 3 2015.docx

All, here is the framework for the Action Plan we developed this afternoon. I added an OEJTA category with several items that we discussed and seemed important. Please input your program information. Add anything you think is missing.

David, Arturo, I did not include the Communications Plan in this file since it is different from the action plan.

I am sending to DD/Deputies and cc'd a few others that may be tapped for input. Share with your folks as needed.

Instructions:

DO NOT add any formatting. Insert your information using Times Roman 12, single line formatting.

Find your header and topic, then insert your story and information.

One submission from each division.

I will try to get this posted on a sharepoint for future editing, but for now, please get your input to me and copy Tomika McGee ASAP.

Thanks

Message

From: Mickunas, Dave [Mickunas.Dave@epa.gov]
Sent: 12/3/2015 9:54:32 PM
To: Coleman, Sam [Coleman.Sam@epa.gov]
Subject: Re: TAGA Monitoring and Analysis for Chloroprene and 1,3-Butadiene

Thanks - if I can help, let me know.
Dave

Sent from my iPhone

On Dec 3, 2015, at 4:50 PM, Coleman, Sam <Coleman.Sam@epa.gov> wrote:

Thanks. Location needed is LaPlace, LA. We have some work to do before a decision is made. We will let you know.

Samuel Coleman, P.E.,
Deputy Regional Administrator

coleman.sam@epa.gov

214.665.2100

214.665.3110 Direct

214.789.2016 Cell

<image001.jpg> 

From: Mickunas, Dave
Sent: Thursday, December 03, 2015 3:18 PM
To: Coleman, Sam
Subject: TAGA Monitoring and Analysis for Chloroprene and 1,3-Butadiene

Good Afternoon Sam,

Yes, the TAGAs are still operating. We have experience with 1,3-butadiene and can monitor for it. We do not have experience with chloroprene but from experience I believe we should be able to monitor for this compound also. The main issue is that the chloroprene is not a compound that is in the traditional TO15 mix; therefore, a standard would have to be ordered and that takes about 8 week to prepare, stabilize, and certify by the manufacturer. If you have any questions, please call me on my cellular if I can be of assistance. I owe you a dinner – I still remember when you took Dave Wright and me out for BBQ – excellent BBQ.

Best regards,
David B. Mickunas
Trace Atmospheric Gas Analyzer (TAGA) Laboratories Coordinator
US EPA/Environmental Response Team
109 T.W. Alexander Drive
Mail Code E343-04
Research Triangle Park, NC 27711

919 541 4191 (office)
609 865 1574 (cellular)
<image004.png>

Message

From: Stenger, Wren [stenger.wren@epa.gov]
Sent: 12/1/2015 11:34:27 PM
To: Coleman, Sam [Coleman.Sam@epa.gov]; Blevins, John [Blevins.John@epa.gov]; Blanco, Arturo [Blanco.Arturo@epa.gov]; Gray, David [gray.david@epa.gov]
Subject: RE: NATA Briefing for Janet

ok

WREN STENGER

Director

Multimedia Planning and Permitting Division

EPA Region 6 Dallas, Texas

214.665.6583

From: Coleman, Sam
Sent: Tuesday, December 01, 2015 4:56 PM
To: Stenger, Wren; Blevins, John; Blanco, Arturo; Gray, David
Subject: FW: NATA Briefing for Janet

We need to send a consistent message that we think this announcement should be after the holidays.

Samuel Coleman, P.E.,
Deputy Regional Administrator

coleman.sam@epa.gov

214.665.2100

214.665.3110 Direct

214.789.2016 Cell



From: Blanco, Arturo
Sent: Tuesday, December 01, 2015 3:31 PM
To: Coleman, Sam
Subject: FW: NATA Briefing for Janet

See below

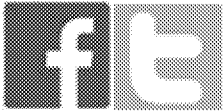
From: Anderson, Israel
Sent: Tuesday, December 01, 2015 12:48 PM
To: Blanco, Arturo
Cc: Smith, Rhonda
Subject: RE: NATA Briefing for Janet

1. It is my understanding from Rueben Casso that they have had discussions with staff from OAQPS on this matter. Additionally, Laura McKelvy called me last week after speaking to folks in 6MM Air to give me a heads up and said that she wanted me to know about it.
2. I do not know who or if they are discussing this with anyone in Louisiana. We in OEJTIA are not having discussions with anyone.

From: Blanco, Arturo
Sent: Tuesday, December 01, 2015 11:32 AM
To: Anderson, Israel
Cc: Smith, Rhonda
Subject: FW: NATA Briefing for Janet
Importance: High

Israel, please read Sam's message below and let me know who, what, how to answer his questions.

Arturo J. Blanco
Director
Office of Environmental Justice, Tribal and International Affairs
US EPA Region 6
1445 Ross Avenue (6RA-DA)
Dallas, TX 75202
214.665.3182 (o)
214.531.8629 (m)



From: Coleman, Sam
Sent: Tuesday, December 01, 2015 10:59 AM
To: Stenger, Wren; Gray, David; Blevins, John; Blanco, Arturo
Subject: FW: NATA Briefing for Janet

Read this ppt. Slides 17-21.

Who is HQ working with in the Region?
Who are they discussing this with in LA?
Need to know today!

Samuel Coleman, P.E.,
Deputy Regional Administrator
coleman.sam@epa.gov
214.665.2100
214.665.3110 Direct
214.789.2016 Cell



From: Blevins, John
Sent: Tuesday, December 01, 2015 8:49 AM

To: Coleman, Sam; Harrison, Ben
Subject: Fwd: NATA Briefing for Janet

Sent from my iPhone

Begin forwarded message:

From: "Gilrein, Stephen" <gilrein.stephen@epa.gov>
Date: December 1, 2015 at 8:26:21 AM CST
To: "Blevins, John" <Blevins.John@epa.gov>
Subject: FW: NATA Briefing for Janet

From: Verhalen, Frances
Sent: Tuesday, December 01, 2015 8:07 AM
To: Gilrein, Stephen
Cc: Yurk, Jeffrey
Subject: FW: NATA Briefing for Janet

FYI...

Frances Verhalen, P.E., Chief
Air Monitoring and Grants Section
US Environmental Protection Agency
1445 Ross Avenue (MC 6MM-AM)
Dallas, TX 75202
214-665-2172
verhalen.frances@epa.gov

From: Verhalen, Frances
Sent: Tuesday, December 01, 2015 8:04 AM
To: Gray, David; Wren Stenger; Hansen, Mark
Subject: FW: NATA Briefing for Janet

Draft briefing for Janet on NATA including chloroprene at the DuPont Lake Pontchartrain Works (pages 16-21).

NEW risk information in the powerpoint regarding Tulsa, OK and expected to be released as part of the NATA information (pages 7-11).

1 census tract in Tulsa is estimated as having > 1 in 10,000 cancer risk. The predicted risk is primarily due to mobile source emissions –on-road light duty vehicles and Non-road vehicles + Biogenics . The pollutant drivers are formaldehyde, benzene and 1,3-butadiene. Formaldehyde is subject to secondary formation in the atmosphere from emissions of its precursors.

State
County

OK
Tulsa County

FIPS	40143002500
POP2010	3980
TotalRisk	101.37
Biogenics	22.06
Fires	4.01
Point	9.89
Nonpoint	2.00
Nonroad	11.74
Onroad	36.26
Secondary	10.55
Background	3.78

Message

From: Curry, Ron [Curry.Ron@epa.gov]
Sent: 12/20/2015 10:35:22 PM
To: Gray, David [gray.david@epa.gov]; Coleman, Sam [Coleman.Sam@epa.gov]; Stenger, Wren [stenger.wren@epa.gov]
Subject: Fwd: from my hotlist

Sent from my iPhone

Begin forwarded message:

From: "McCabe, Janet" <McCabe.Janet@epa.gov>
Date: December 19, 2015 at 5:33:50 PM MST
To: "Curry, Ron" <Curry.Ron@epa.gov>
Subject: from my hotlist

NATA Rollout: We worked closely with the regions this past week to prepare for the next installment of NATA. We posted the report Thursday after holding a series of calls with Louisiana state officials, the Congressional delegation and the local Parish President about the chloroprene issue in LaPlace. David Gray and the Region 6 air team and ORD provided invaluable support and so far things have been relatively quiet. Region 6 will maintain outreach with the affected communities in January. (shared with Ron).

Ron—thanks for your and your team's hard work on this. I really didn't hear any explosions on Thursday or Friday from either Louisiana or anywhere else in the country.

Enjoy the holidays....

Janet

Message

From: Anderson, Israel [Anderson.Israel@epa.gov]
Sent: 12/1/2015 9:34:51 PM
To: Coleman, Sam [Coleman.Sam@epa.gov]
Subject: FW: EJSCREEN - Dupont Pontchartrain Works - LAPLACE, LA
Attachments: Dupont Pontchartrain Works ejscreen .5 mile Radius.pdf; Dupont Pontchartrain Works ejscreen - 1 mile Radius.pdf; Dupont Pontchartrain Works ejscreen - 3 mile Radius.pdf

EJSCREEN data for Dupont Pontchartrain Works, LaPlace, LA at half mile, 1 mile and 3 mile radius [points from the facility].

From: Runnels, Charlotte
Sent: Tuesday, December 01, 2015 1:14 PM
To: Anderson, Israel
Subject: EJSCREEN - Dupont Pontchartrain Works - LAPLACE, LA

Israel,

Attached are EJSCREEN Reports for Dupont Pontchartrain Works within a 5 mile, 1 mile and 3 mile radius of the facility.

To locate the address of the facility, I used the longitude and latitude from the ECHO database. See link below. <http://echo.epa.gov/detailed-facility-report?fid=110000597131>

Message

From: Blanco, Arturo [Blanco.Arturo@epa.gov]
Sent: 12/1/2015 9:32:12 PM
To: Coleman, Sam [Coleman.Sam@epa.gov]; Gray, David [gray.david@epa.gov]; Stenger, Wren [stenger.wren@epa.gov]; Blevins, John [Blevins.John@epa.gov]
Subject: FW: EJSCREEN - Dupont Pontchartrain Works - LAPLACE, LA
Attachments: Dupont Pontchartrain Works ejscreen .5 mile Radius.pdf; ATT00001.htm; Dupont Pontchartrain Works ejscreen - 1 mile Radius.pdf; ATT00002.htm; Dupont Pontchartrain Works ejscreen - 3 mile Radius.pdf; ATT00003.htm

fyi

Arturo J. Blanco
Director
Office of Environmental Justice, Tribal and International Affairs
US EPA Region 6
1445 Ross Avenue (6RA-DA)
Dallas, TX 75202
214.665.3182 (o)
214.531.8629 (m)



From: Anderson, Israel
Sent: Tuesday, December 01, 2015 2:08 PM
To: Blanco, Arturo; Smith, Rhonda
Subject: Fwd: EJSCREEN - Dupont Pontchartrain Works - LAPLACE, LA

Here is EJSCREEN data.

Sent from my iPhone

Begin forwarded message:

From: "Runnels, Charlotte" <Runnels.Charlotte@epa.gov>
Date: December 1, 2015 at 1:13:59 PM CST
To: "Anderson, Israel" <Anderson.Israel@epa.gov>
Subject: EJSCREEN - Dupont Pontchartrain Works - LAPLACE, LA

Israel,

Attached are EJSCREEN Reports for Dupont Pontchartrain Works within a 5 mile, 1 mile and 3 mile radius of the facility.

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Subject: FW: NATA Briefing for Janet

See below

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Cc: Smith, Rhonda
Subject: RE: NATA Briefing for Janet

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Importance: High

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Arturo J. Blanco
Director
Office of Environmental Justice, Tribal and International Affairs
US EPA Region 6
1445 Ross Avenue (6RA-DA)
Dallas, TX 75202
214.665.3182 (o)
214.531.8629 (m)



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Sent: Tuesday, December 01, 2015 10:59 AM
To: Stenger, Wren; Gray, David; Blevins, John; Blanco, Arturo
Subject: FW: NATA Briefing for Janet

Read this ppt. Slides 17-21.

Who is HQ working with in the Region?

Who are they discussing this with in LA?
Need to know today!

Samuel Coleman, P.E.,
Deputy Regional Administrator

coleman.sam@epa.gov

214.665.2100

214.665.3110 Direct

214.789.2016 Cell



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Sent: Tuesday, December 01, 2015 8:49 AM
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Subject: Fwd: NATA Briefing for Janet

Sent from my iPhone

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To: "Blevins, John" <Blevins.John@epa.gov>
Subject: FW: NATA Briefing for Janet

From: Verhalen, Frances
Sent: Tuesday, December 01, 2015 8:07 AM
To: Gilrein, Stephen
Cc: Yurk, Jeffrey
Subject: FW: NATA Briefing for Janet

FYI...

Frances Verhalen, P.E., Chief
Air Monitoring and Grants Section
US Environmental Protection Agency
1445 Ross Avenue (MC 6MM-AM)
Dallas, TX 75202
214-665-2172
verhalen.frances@epa.gov

From: Verhalen, Frances
Sent: Tuesday, December 01, 2015 8:04 AM
To: Gray, David; Wren Stenger; Hansen, Mark
Subject: FW: NATA Briefing for Janet

Draft briefing for Janet on NATA including chloroprene at the DuPont Lake Pontchartrain Works (pages 16-21).

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County	Tulsa County
FIPS	40143002500
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Fires	4.01
Point	9.89
Nonpoint	2.00
Nonroad	11.74
Onroad	36.26
Secondary	10.55
Background	3.78

Message

From: Coleman, Sam [Coleman.Sam@epa.gov]
Sent: 11/25/2015 8:11:42 PM
To: Szaro, Deb [Szaro.Deb@epa.gov]; McCabe, Catherine [McCabe.Catherine@epa.gov]; Rodrigues, Cecil [rodrigues.cecil@epa.gov]; Heard, Anne [Heard.Anne@epa.gov]; Kaplan, Robert [kaplan.robert@epa.gov]; Brincks, Mike [brincks.mike@epa.gov]; Thomas, Deb [thomas.debrah@epa.gov]; Strauss, Alexis [Strauss.Alexis@epa.gov]; Pirzadeh, Michelle [Pirzadeh.Michelle@epa.gov]; Jordan, Deborah [Jordan.Deborah@epa.gov]
Subject: FW: National Air Toxics Assessment (NATA) Data - Chloroprene Risk in LaPlace Louisiana
Attachments: NATA-Chloroprene risk111715.doc

Last year, Dec 14, we began a process to communicate some critical information to folks in LA. After the initial outreach, many staff and managers took some much deserved time off, leaving a void when questions came up. If there is any way to put this announcement off to mid January, this would help the LA conversation greatly.

Samuel Coleman, P.E.
Deputy Regional Administrator
Region 6
coleman.sam@epa.gov
214.665.2100 Ofc
214.665.3110 Direct
214.789.2016 Cell
Sent from my Windows Phone

From: Stenger, Wren
Sent: 11/23/2015 5:28 PM
To: Curry, Ron; Coleman, Sam; Gray, David; Ruiz, Thomas
Subject: FW: National Air Toxics Assessment (NATA) Data - Chloroprene Risk in LaPlace Louisiana

Ron, Sam,

I mentioned this morning. HQs plans to release NATA in December. We have informed the state and HQs has worked directly with Dupont. Previously, EPA did not have a chloroprene risk number in IRIS, and now, the national air toxics assessment predicts risk of cancer from the chloroprene emissions from Dupont (Dupont Ponchartrain Works in La Place, Louisiana) is about 9 in 10,000. This is based on modeled emissions and an estimated emission.

Janet will be briefed this week and I just wanted to make you aware. The fact sheet attached is ours, but we expect to get more information from HQs...yet to receive.

David, you may also get information through XA channels.

WREN STENGER
Director
Multimedia Planning and Permitting Division
EPA Region 6 Dallas, Texas
214.665.6583

Message

From: Coleman, Sam [Coleman.Sam@epa.gov]
Sent: 12/14/2015 8:11:13 PM
To: Stenger, Wren [stenger.wren@epa.gov]; Curry, Ron [Curry.Ron@epa.gov]; Ruiz, Thomas [Ruiz.Thomas@epa.gov]; Gray, David [gray.david@epa.gov]
Subject: RE: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 14 2015.docx

Better.

Samuel Coleman, P.E.
Deputy Regional Administrator
Region 6
coleman.sam@epa.gov
214.665.2100 Ofc
214.665.3110 Direct
214.789.2016 Cell
Sent from my Windows Phone

From: Stenger, Wren
Sent: 12/14/2015 2:25 PM
To: Curry, Ron; Coleman, Sam; Ruiz, Thomas; Gray, David
Subject: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 14 2015.docx

Based on our discussions this morning, I edited the first page of our action plan to emphasize that NATA provides estimates and potential risk that must be further investigated. See if this improves the story for the community.

Message

From: Coleman, Sam [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8246A5315FF54185AC8C8BF90D5A393E-COLEMAN, SAM]
Sent: 12/3/2015 9:50:23 PM
To: Mickunas, Dave [Mickunas.Dave@epa.gov]
Subject: RE: TAGA Monitoring and Analysis for Chloroprene and 1,3-Butadiene

Thanks. Location needed is LaPlace, LA. We have some work to do before a decision is made. We will let you know.

**Samuel Coleman, P.E.,
Deputy Regional Administrator**

coleman.sam@epa.gov

214.665.2100

214.665.3110 Direct

214.789.2016 Cell



From: Mickunas, Dave
Sent: Thursday, December 03, 2015 3:18 PM
To: Coleman, Sam
Subject: TAGA Monitoring and Analysis for Chloroprene and 1,3-Butadiene

Good Afternoon Sam,

Yes, the TAGAs are still operating. We have experience with 1,3-butadiene and can monitor for it. We do not have experience with chloroprene but from experience I believe we should be able to monitor for this compound also. The main issue is that the chloroprene is not a compound that is in the traditional TO15 mix; therefore, a standard would have to be ordered and that takes about 8 week to prepare, stabilize, and certify by the manufacturer. If you have any questions, please call me on my cellular if I can be of assistance. I owe you a dinner – I still remember when you took Dave Wright and me out for BBQ – excellent BBQ.

Best regards,
David B. Mickunas
Trace Atmospheric Gas Analyzer (TAGA) Laboratories Coordinator
US EPA/Environmental Response Team
109 T.W. Alexander Drive
Mail Code E343-04
Research Triangle Park, NC 27711
919 541 4191 (office)
609 865 1574 (cellular)



Message

From: Coleman, Sam [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8246A5315FF54185AC8C8BF90D5A393E-COLEMAN, SAM]
Sent: 12/2/2015 8:59:34 PM
To: Blevins, John [Blevins.John@epa.gov]; Stenger, Wren [stenger.wren@epa.gov]; Honker, William [honker.william@epa.gov]; Gray, David [gray.david@epa.gov]
Subject: FW: EJSCREEN - Dupont Pontchartrain Works - LAPLACE, LA
Attachments: Dupont Pontchartrain Works ejscreen .5 mile Radius.pdf; Dupont Pontchartrain Works ejscreen - 1 mile Radius.pdf; Dupont Pontchartrain Works ejscreen - 3 mile Radius.pdf

FYSA

We will need a good plan for this NATA roll out.

Samuel Coleman, P.E.,
Deputy Regional Administrator

coleman.sam@epa.gov

214.665.2100

214.665.3110 Direct

214.789.2016 Cell



From: Anderson, Israel
Sent: Tuesday, December 01, 2015 3:35 PM
To: Coleman, Sam
Subject: FW: EJSCREEN - Dupont Pontchartrain Works - LAPLACE, LA

EJSCREEN data for Dupont Pontchartrain Works, LaPlace, LA at half mile, 1 mile and 3 mile radius [points from the facility].

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To: Anderson, Israel
Subject: EJSCREEN - Dupont Pontchartrain Works - LAPLACE, LA

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To locate the address of the facility, I used the longitude and latitude from the ECHO database. See link below. <http://echo.epa.gov/detailed-facility-report?fid=110000597131>

Message

From: Coleman, Sam [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8246A5315FF54185AC8C8BF90D5A393E-COLEMAN, SAM]
Sent: 12/2/2015 6:07:41 PM
To: Rodrigues, Cecil [rodrigues.cecil@epa.gov]
Subject: FW: NATA briefing for Janet McCabe 12 2 15 (2).pptx
Attachments: NATA briefing for Janet McCabe 12 2 15 (2).pptx

Making sure you are in the loop.

Samuel Coleman, P.E.,
Deputy Regional Administrator

coleman.sam@epa.gov

214.665.2100

214.665.3110 Direct

214.789.2016 Cell



From: Coleman, Sam
Sent: Wednesday, December 02, 2015 12:05 PM
To: DRA
Subject: NATA briefing for Janet McCabe 12 2 15 (2).pptx

FYSA

Samuel Coleman, P.E.,
Deputy Regional Administrator

coleman.sam@epa.gov

214.665.2100

214.665.3110 Direct

214.789.2016 Cell



Message

From: Coleman, Sam [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8246A5315FF54185AC8C8BF90D5A393E-COLEMAN, SAM]
Sent: 12/2/2015 6:05:08 PM
To: DRA [DRA@epa.gov]
Subject: NATA briefing for Janet McCabe 12 2 15 (2).pptx
Attachments: NATA briefing for Janet McCabe 12 2 15 (2).pptx

FYSA

Samuel Coleman, P.E.,
Deputy Regional Administrator

coleman.sam@epa.gov

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214.665.3110 Direct

214.789.2016 Cell



Message

From: Coleman, Sam [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8246A5315FF54185AC8C8BF90D5A393E-COLEMAN, SAM]
Sent: 11/30/2015 9:39:43 PM
To: Blevins, John [Blevins.John@epa.gov]; Blanco, Arturo [Blanco.Arturo@epa.gov]; Gray, David [gray.david@epa.gov]; Stenger, Wren [stenger.wren@epa.gov]; Gilrein, Stephen [gilrein.stephen@epa.gov]; Smith, Rhonda [smith.rhonda@epa.gov]; Luthans, William [luthans.william@epa.gov]; Taheri, Diane [Taheri.Diane@epa.gov]
CC: Williams, Odessa [Williams.Odessa@epa.gov]
Subject: RE: DuPont facility in Laplace, LA

We should get together later this week to discuss the strategy on this.

Samuel Coleman, P.E.,
Deputy Regional Administrator
coleman.sam@epa.gov
214.665.2100
214.665.3110 Direct
214.789.2016 Cell



From: Blevins, John
Sent: Monday, November 30, 2015 2:08 PM
To: Coleman, Sam; Blanco, Arturo; Gray, David; Stenger, Wren
Cc: Gilrein, Stephen
Subject: FW: DuPont facility in Laplace, LA

FYI...we would like to reach out to OECA but wanted to touch base with all of you prior to doing that...

John



From: Gilrein, Stephen
Sent: Tuesday, November 24, 2015 3:27 PM
To: Blevins, John
Subject: FW: DuPont facility in Laplace, LA

We need to follow-up with OECA. This is very troubling. We need a timely plan forward.

From: Yurk, Jeffrey
Sent: Tuesday, November 24, 2015 12:36 PM
To: Gilrein, Stephen
Subject: DuPont facility in Laplace, LA

Steve: I wanted to make you aware that there is a potential for cancer risk above traditional levels of concern to the communities surrounding the DuPont facility in Laplace, LA from releases of the hazardous air pollutant chloroprene. Potential cancer risk modeled at the census block level (likely an EJ community) in the soon to be released NATA study, shows cancer risk to be 2×10^{-3} . A cancer slope factor for chloroprene was finalized and released by EPA in March of 2011, prior to that chloroprene was not listed as a carcinogen. RTP just completed risk modeling utilizing the 2011 National Emissions Inventory. The NATA is scheduled to be released on December 15th. The primary uncertainties around the risk assessment are the source-specific emissions reported by the facility calculated utilizing engineering calculations. The DuPont facility does appear to be operating below their permit limit. They are permitted to release 191 tons and are releasing about 125 tons. No other sources of chloroprene within the Region report emitting even one ton.

Jeff

p.s. I can conduct a finer scale modeling if necessary to project risk at the neighborhood level. It would probably take me until mid-January to complete.

Message

From: Curry, Ron [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F752DDF47C7143A39AD66F5BE21C2FD7-CURRY, RON]
Sent: 12/4/2015 5:56:14 PM
To: Rupp, Mark [Rupp.Mark@epa.gov]
CC: Coleman, Sam (Coleman.Sam@epa.gov) [Coleman.Sam@epa.gov]
Subject: FW: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 3 2015.docx
Attachments: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 3 2015.docx

Very early draft.

From: Stenger, Wren
Sent: Thursday, December 03, 2015 4:27 PM
To: Blevins, John; Seager, Cheryl; Edlund, Carl; Garcia, David; Gilrein, Stephen; Gray, David; Harrison, Ben; Hill, Troy; Honker, William; McDonald, James; Phillips, Pam; Smith, Rhonda; Taheri, Diane; Blanco, Arturo; Coleman, Sam; Curry, Ron
Cc: Crossland, Ronnie; Yurk, Jeffrey; Johnson, Lydia; Verhalen, Frances; Hansen, Mark; Casso, Ruben; Anderson, Israel; Runnels, Charlotte; Brown, James; McGee, Tomika
Subject: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 3 2015.docx

All, here is the framework for the Action Plan we developed this afternoon. I added an OEJTA category with several items that we discussed and seemed important. Please input your program information. Add anything you think is missing.

David, Arturo, I did not include the Communications Plan in this file since it is different from the action plan.

I am sending to DD/Deputies and cc'd a few others that may be tapped for input. Share with your folks as needed.

Instructions:

DO NOT add any formatting. Insert your information using Times Roman 12, single line formatting.

Find your header and topic, then insert your story and information.

One submission from each division.

I will try to get this posted on a sharepoint for future editing, but for now, please get your input to me and copy Tomika McGee ASAP.

Thanks

Message

From: Crossland, Ronnie [Crossland.Ronnie@epa.gov]
Sent: 12/7/2015 2:40:20 PM
To: Edlund, Carl [Edlund.Carl@epa.gov]
CC: Phillips, Pam [phillips.pam@epa.gov]; Petersen, Chris [petersen.chris@epa.gov]
Subject: FW: Information for OSHA

Carl,

Here is the information I gathered on Friday regarding the Dupont LaPlace situation.

Thanks,
Ronnie

From: Gilrein, Stephen
Sent: Friday, December 04, 2015 8:43 AM
To: Crossland, Ronnie
Subject: Fwd: Information for OSHA

Sent from my iPhone

Begin forwarded message:

From: "Yurk, Jeffrey" <yurk.jeffrey@epa.gov>
Date: December 4, 2015 at 7:04:01 AM CST
To: "Gilrein, Stephen" <gilrein.stephen@epa.gov>
Subject: Information for OSHA

Steve: EPA has recently completed their 2011 National Air Toxics Assessment (NATA) and are scheduled to release their results on December 15th. As a heads-up to OSHA, they may want to look into on-site worker exposures to chloroprene (CAS # 126-99-8) at the Dupont facility in LaPlace, LA. The NATA study shows offsite cancer risks ranging from 1,800 to 3,000 in a million. EPA's regulatory level of concern ranged between 1 and 100 in a million. Emissions of chloroprene at the facility have not changed since the last NATA study was completed utilizing data from 2009, however in 2010, EPA determined that chloroprene was a likely human carcinogen and a Unit Risk Estimate was developed. Since, about 1/3 of the emissions are coming from fugitive emissions and sources like building exhaust fans, it would appear to be prudent to evaluate worker exposure. Below is a summary from the NATA study.

Jeff

- The 2011 NATA results, publically available at the census tract level, contain a tract with a cancer risk of 900-in-1 million.
- In this tract, the census block driving the risk has a cancer risk of 1,800-in-1 million.
 - Census block risks have been shared with state partners as part of the NATA review process; they will not be publically available.

- The cancer risk of the census block/tract is mainly due to chloroprene emissions from a stationary point source, the Dupont facility, with a cancer risk of 1,800 to 3,000-in-1 million.
 - The cancer risk for this source is currently 1,800-in-1 million at a polar grid receptor. There are some large area sources overlapping census block receptors with higher risks, resulting in those census blocks not being chosen as the MIR receptor.
 - We are working with the facility on the modeling parameters and when the area sources are corrected, a census block receptor should be selected as the MIR receptor. This could result in facility risks of 3,000-in-1 million.
- An IRIS URE (0.0003 per $\mu\text{g}/\text{m}^3$) was developed for chloroprene in 2010. The assessment noted that chloroprene is “likely to be carcinogenic to humans.”
 - There are five current weight of evidence descriptors: carcinogenic to humans, likely to be carcinogenic to humans, suggestive evidence of carcinogenic potential, inadequate information to assess carcinogenic potential, and not likely to be carcinogenic to humans.
 - Previously, EPA classified chloroprene as Group D, not classifiable as to human carcinogenicity, because of the absence of adequate data
- The IRIS URE was used in the 2011 NATA, with a modification to account for chloroprene having a mutagenic mode of action. The actual value used was 0.00048 per $\mu\text{g}/\text{m}^3$.
- Prior to 2010, chloroprene was not assessed for cancer risks because there was not a URE.
- An IRIS RfC (0.02 mg/m^3) was also developed for chloroprene in 2010. The critical effects, seen in male and female mice and rats, include an increase of incidence in olfactory atrophy, alveolar hyperplasia, and splenic hematopoietic proliferation.

Message

From: Johnson, Lydia [johnson.lydia@epa.gov]
Sent: 12/7/2015 5:24:14 PM
To: Stenger, Wren [stenger.wren@epa.gov]
CC: Edlund, Carl [Edlund.Carl@epa.gov]; Phillips, Pam [phillips.pam@epa.gov]; Crossland, Ronnie [Crossland.Ronnie@epa.gov]; Ruhl, Christopher [Ruhl.Christopher@epa.gov]
Subject: RE: DuPont LaPlace LA Action Plan Chloroprene Dec 3 2015.docx

Wren,
Here's the latest on the sale of the business and facility ownership.

I. SUPERFUND

- DuPont Pontchartrain Works Ownership – Contact: Lydia Johnson

Dupont owns the Ponchartrain Works facility. According to Denka Performance Elastomer, LLC (Denka), it acquired the DuPont™ Neoprene segment on October 30, 2015 and Denka is onsite. Dupont is still listed with the parish as the owner of the facility and Denka is not listed with the Tax Assessor as a property owner in the parish.

From: Stenger, Wren
Sent: Thursday, December 03, 2015 5:29 PM
To: Curry, Ron; Coleman, Sam; Blanco, Arturo; Blevins, John; Seager, Cheryl; Edlund, Carl; Garcia, David; Gilrein, Stephen; Gray, David; Harrison, Ben; Honker, William; Phillips, Pam; Smith, Rhonda; Taheri, Diane; Pettigrew, George; Lyke, Jennifer
Cc: Brown, Jamesr; Runnels, Charlotte; Ruiz, Thomas; Anderson, Israel; Hansen, Mark; Verhalen, Frances; Casso, Ruben; Yurk, Jeffrey; Ruhl, Christopher; Johnson, Lydia; Young, Carl; McGee, Tomika; Crossland, Ronnie
Subject: DuPont LaPlace LA Action Plan Chloroprene Dec 3 2015.docx

I already have some input so am resending the draft action plan. You can begin to see what this will ultimately look like. Thanks for the quick input so far. Still
DRAFT

Message

From: Crossland, Ronnie [Crossland.Ronnie@epa.gov]
Sent: 12/3/2015 10:30:24 PM
To: Edlund, Carl [Edlund.Carl@epa.gov]; Phillips, Pam [phillips.pam@epa.gov]
Subject: Fwd: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 3 2015.docx
Attachments: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 3 2015.docx; ATT00001.htm

Any idea what this is about?

Ronnie

Sent from my iPad

Begin forwarded message:

From: "Stenger, Wren" <stenger.wren@epa.gov>
Date: December 3, 2015 at 5:26:34 PM EST
To: "Blevins, John" <Blevins.John@epa.gov>, "Seager, Cheryl" <Seager.Cheryl@epa.gov>, "Edlund, Carl" <Edlund.Carl@epa.gov>, "Garcia, David" <Garcia.David@epa.gov>, "Gilrein, Stephen" <gilrein.stephen@epa.gov>, "Gray, David" <gray.david@epa.gov>, "Harrison, Ben" <Harrison.Ben@epa.gov>, "Hill, Troy" <Hill.Troy@epa.gov>, "Honker, William" <honker.william@epa.gov>, "McDonald, James" <McDonald.James@epa.gov>, "Phillips, Pam" <phillips.pam@epa.gov>, "Smith, Rhonda" <smith.rhonda@epa.gov>, "Taheri, Diane" <Taheri.Diane@epa.gov>, "Blanco, Arturo" <Blanco.Arturo@epa.gov>, "Coleman, Sam" <Coleman.Sam@epa.gov>, "Curry, Ron" <Curry.Ron@epa.gov>
Cc: "Crossland, Ronnie" <Crossland.Ronnie@epa.gov>, "Yurk, Jeffrey" <yurk.jeffrey@epa.gov>, "Johnson, Lydia" <johnson.lydia@epa.gov>, "Verhalen, Frances" <verhalen.frances@epa.gov>, "Hansen, Mark" <Hansen.Mark@epa.gov>, "Casso, Ruben" <Casso.Ruben@epa.gov>, "Anderson, Israel" <Anderson.Israel@epa.gov>, "Runnels, Charlotte" <Runnels.Charlotte@epa.gov>, "Brown, Jamesr" <brown.jamesr@epa.gov>, "McGee, Tomika" <McGee.Tomika@epa.gov>
Subject: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 3 2015.docx

All, here is the framework for the Action Plan we developed this afternoon. I added an OEJTA category with several items that we discussed and seemed important. Please input your program information. Add anything you think is missing.

David, Arturo, I did not include the Communications Plan in this file since it is different from the action plan.

I am sending to DD/Deputies and cc'd a few others that may be tapped for input. Share with your folks as needed.

Instructions:

DO NOT add any formatting. Insert your information using Times Roman 12, single line formatting.

Find your header and topic, then insert your story and information.

One submission from each division.

I will try to get this posted on a sharepoint for future editing, but for now, please get your input to me and copy Tomika McGee ASAP.

Thanks

Message

From: Edlund, Carl [Edlund.Carl@epa.gov]
Sent: 12/4/2015 2:06:09 AM
To: Phillips, Pam [phillips.pam@epa.gov]; Johnson, Lydia [johnson.lydia@epa.gov]; Crossland, Ronnie [Crossland.Ronnie@epa.gov]; Ruhl, Christopher [Ruhl.Christopher@epa.gov]
Subject: RE: DuPont LaPlace LA Action Plan Chloroprene Dec 3 2015.docx

I'm good with that team.

Sent from my Windows Phone

From: Phillips, Pam
Sent: 12/3/2015 6:24 PM
To: Edlund, Carl; Johnson, Lydia; Crossland, Ronnie; Ruhl, Christopher
Subject: FW: DuPont LaPlace LA Action Plan Chloroprene Dec 3 2015.docx

I forwarded Chris' msg to Wren and she added the language that Chris R provided. Do we want to comment back that Chris is contact for availability of the equipment/ Ruben and the lab guy for sampling protocols? Any other comments? Ronnie and Chris, I will next forward the original msg from Wren. Carl and Lydia already have the original msg

From: Stenger, Wren
Sent: Thursday, December 03, 2015 5:29 PM
To: Curry, Ron; Coleman, Sam; Blanco, Arturo; Blevins, John; Seager, Cheryl; Edlund, Carl; Garcia, David; Gilrein, Stephen; Gray, David; Harrison, Ben; Honker, William; Phillips, Pam; Smith, Rhonda; Taheri, Diane; Pettigrew, George; Lyke, Jennifer
Cc: Brown, Jamesr; Runnels, Charlotte; Ruiz, Thomas; Anderson, Israel; Hansen, Mark; Verhalen, Frances; Casso, Ruben; Yurk, Jeffrey; Ruhl, Christopher; Johnson, Lydia; Young, Carl; McGee, Tomika; Crossland, Ronnie
Subject: DuPont LaPlace LA Action Plan Chloroprene Dec 3 2015.docx

I already have some input so am resending the draft action plan. You can begin to see what this will ultimately look like. Thanks for the quick input so far. Still DRAFT

Message

From: Osbourne, Margaret [osbourne.margaret@epa.gov]
Sent: 12/11/2015 7:11:47 PM
To: Throwe, Scott [Throwe.Scott@epa.gov]; Fried, Gregory [Fried.Gregory@epa.gov]
CC: Thompson, Steve [thompson.steve@epa.gov]
Subject: draft 114 to DuPont/Denka LaPlace, LA
Attachments: E.I. DuPont de Nemours and Co. Draft 114 Request Letter Template - Dec 2015 rev2.doc; Denka Draft 114 Request Letter Template - Dec 2015 link update JL.doc

Hi Scott and Greg:

Here's our draft 114 to send to DuPont and Denka La Place, LA re: chloroprene. Denka bought the chloroprene units last month, so we're planning to send letters to both. Let us know if you have any comments.

Thanks,
Margaret

Margaret Osbourne
Chief, Air Toxics Section
Compliance Assurance & Enforcement Division
EPA Region 6
1445 Ross Avenue (6EN-AT)
Dallas, TX 75202
214-665-6508

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This e-mail may be privileged and/or confidential, and the sender does not waive any related rights and obligations. It is intended for the named recipient(s) only. Any distribution, use or copying of this e-mail or the information it contains by other than an intended recipient is unauthorized. If you received this e-mail in error, please advise me (by return e-mail or otherwise) immediately and do not duplicate it or disclose its contents to anyone.

Message

From: Blevins, John [Blevins.John@epa.gov]
Sent: 12/2/2015 3:31:58 PM
To: Gilrein, Stephen [gilrein.stephen@epa.gov]
Subject: FW: EJSCREEN - Dupont Pontchartrain Works - LAPLACE, LA
Attachments: Dupont Pontchartrain Works ejscreen .5 mile Radius.pdf; ATT00001.htm; Dupont Pontchartrain Works ejscreen - 1 mile Radius.pdf; ATT00002.htm; Dupont Pontchartrain Works ejscreen - 3 mile Radius.pdf; ATT00003.htm



From: Blanco, Arturo
Sent: Tuesday, December 01, 2015 3:32 PM
To: Coleman, Sam; Gray, David; Stenger, Wren; Blevins, John
Subject: FW: EJSCREEN - Dupont Pontchartrain Works - LAPLACE, LA

fyi

Arturo J. Blanco
Director
Office of Environmental Justice, Tribal and International Affairs
US EPA Region 6
1445 Ross Avenue (6RA-DA)
Dallas, TX 75202
214.665.3182 (o)
214.531.8629 (m)



From: Anderson, Israel
Sent: Tuesday, December 01, 2015 2:08 PM
To: Blanco, Arturo; Smith, Rhonda
Subject: Fwd: EJSCREEN - Dupont Pontchartrain Works - LAPLACE, LA

Here is EJSCREEN data.

Sent from my iPhone

Begin forwarded message:

From: "Runnels, Charlotte" <Runnels.Charlotte@epa.gov>
Date: December 1, 2015 at 1:13:59 PM CST
To: "Anderson, Israel" <Anderson.Israel@epa.gov>
Subject: EJSCREEN - Dupont Pontchartrain Works - LAPLACE, LA

Israel,

Attached are EJSCREEN Reports for Dupont Pontchartrain Works within a 5 mile, 1 mile and 3 mile radius of the facility.

To locate the address of the facility, I used the longitude and latitude from the ECHO database. See link below. <http://echo.epa.gov/detailed-facility-report?fid=110000597131>

Message

From: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Sent: 11/24/2015 6:36:09 PM
To: Gilrein, Stephen [gilrein.stephen@epa.gov]
Subject: DuPont facility in Laplace, LA

Steve: I wanted to make you aware that, there is a potential for cancer risk above traditional levels of concern to the communities surrounding the DuPont facility in Laplace, LA from releases of the hazardous air pollutant chloroprene. Potential cancer risk modeled at the census block level (likely an EJ community) in the soon to be released NATA study, shows cancer risk to be 2×10^{-3} . A cancer slope factor for chloroprene was finalized and released by EPA in March of 2011, prior to that chloroprene was not listed as a carcinogen. RTP just completed risk modeling utilizing the 2011 National Emissions Inventory. The NATA is scheduled to be released on December 15th. The primary uncertainties around the risk assessment are the source-specific emissions reported by the facility calculated utilizing engineering calculations. The DuPont facility does appear to be operating below their permit limit. They are permitted to release 191 tons and are releasing about 125 tons. No other sources of chloroprene within the Region report emitting even one ton.

Jeff

p.s. I can conduct a finer scale modeling if necessary to project risk at the neighborhood level. It would probably take me until mid-January to complete.

Message

From: Thompson, Steve [thompson.steve@epa.gov]
Sent: 12/9/2015 10:29:29 PM
To: Blevins, John [Blevins.John@epa.gov]; Gilrein, Stephen [gilrein.stephen@epa.gov]
Subject: Inquiry regarding Shutdown / Major maintenance at DuPont / Denka

From: Leathers, James
Sent: Wednesday, December 09, 2015 4:28 PM
To: Thompson, Steve
Cc: Osbourne, Margaret
Subject: Re: Shutdown / Major maintenance at DuPont / Denka

Hi Steve,

I found out today that the elastomers units at the formerly owned DuPont facility in Laplace Louisiana are now owned and operated by Denka Performance Elastomers LLC.

I spoke with Plant Manager Of E.I. DuPont de Nemours and Company , Ivan Caldwell today and was informed of the elastomers units being sold. Mr. Caldwell informed me that the units that DuPont still owns and operates, the Diamines Units, were recently shut down for maintenance, and are not planned for any additional shutdowns through May of 2016.

I have contacted Mr. Jorge Lavastida (Executive Officer and Plant Manager at Denka) to inquire about their Major maintenance schedule. I called twice today and left a voice message the second time. The best number that I have for him is (985) 233 – 3085. Let me know if you have any questions. Thanks

James Leathers
U.S. EPA, Region 6
Environmental Engineer
(214) 665-6569
leathers.james@epa.gov

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Message

From: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Sent: 11/19/2015 1:20:30 PM
To: Thompson, Steve [thompson.steve@epa.gov]
CC: Gilrein, Stephen [gilrein.stephen@epa.gov]
Subject: Chloroprene
Attachments: Chloroprene.xlsx

Steve: Attached are the emissions inventory pulls from Louisiana and Texas facilities for chloroprene. It appears the only facility where these emissions pose a risk concern is the DuPont facility in Laplace, LA. The emissions are coming primarily from uncontrolled vents and exhaust fans.

Jeff

Message

From: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Sent: 11/19/2015 3:36:58 PM
To: Gilrein, Stephen [gilrein.stephen@epa.gov]
Subject: RE: Chloroprene

Steve: The only facility worth looking at is the Dupont Laplace. Emissions from all other facilities are over 100 times less. We've already modeled all sources in the Region so we can put the new toxicity number in and see the impact.

Jeff

From: Gilrein, Stephen
Sent: Thursday, November 19, 2015 8:59 AM
To: Yurk, Jeffrey
Subject: Re: Chloroprene

Can you model and see what communities are potentially?

Sent from my iPhone

On Nov 19, 2015, at 7:20 AM, "Yurk, Jeffrey" <yurk.jeffrey@epa.gov> wrote:

Steve: Attached are the emissions inventory pulls from Louisiana and Texas facilities for chloroprene. It appears the only facility where these emissions pose a risk concern is the DuPont facility in Laplace, LA. The emissions are coming primarily from uncontrolled vents and exhaust fans.

Jeff

<Chloroprene.xlsx>

Message

From: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Sent: 11/19/2015 4:58:33 PM
To: Gilrein, Stephen [gilrein.stephen@epa.gov]
Subject: RE: Chloroprene

Steve: Looks like it could be 2×10^{-3} risk to community. A cancer factor was released in March of 2011, before that there was no cancer toxicity factor so all modeling we previously conducted did not show this hot spot. DuPont appears to be operating below their permit limit. They are permitted to release 191 tons and are releasing about 67 tons at sources that match those permit limits. The NATA is scheduled to be release on December 15th. PD and OAQPS have made LDEQ aware of the issue. They have contacted the facility to give them a heads up and got the response that they did not agree with the risk numbers. Yesterday they had a call with the corporate office of DuPont. I'm not sure where this is going, but it is likely there will be some air monitoring conducted to verify emissions estimates.

Jeff

From: Gilrein, Stephen
Sent: Thursday, November 19, 2015 8:59 AM
To: Yurk, Jeffrey
Subject: Re: Chloroprene

Can you model and see what communities are potentially?

Sent from my iPhone

On Nov 19, 2015, at 7:20 AM, "Yurk, Jeffrey" <yurk.jeffrey@epa.gov> wrote:

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Jeff

<Chloroprene.xlsx>

Message

From: Overbay, Connie [Overbay.Connie@epa.gov]
Sent: 12/8/2015 1:53:19 PM
To: Gilrein, Stephen [gilrein.stephen@epa.gov]; Thompson, Steve [thompson.steve@epa.gov]
CC: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Subject: FW: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 3 2015.docx

Wren wants to know about the other parts of the DuPont LaPlace Action Plan. See below.

Thank you,
Connie M. Overbay
Enforcement Coordinator (6EN)
Compliance Assurance and Enforcement Div.
Region 6
(214) 665-7274
(214) 665-7446 (fax)

From: Stenger, Wren
Sent: Monday, December 07, 2015 5:00 PM
To: Overbay, Connie
Subject: RE: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 3 2015.docx

Thanks. Anything for OSHA and NIOSH?

WREN STENGER
Director
Multimedia Planning and Permitting Division
EPA Region 6 Dallas, Texas
214.665.6583

From: Overbay, Connie
Sent: Monday, December 07, 2015 12:26 PM
To: Stenger, Wren
Cc: McGee, Tomika; Blevins, John; Gilrein, Stephen; Thompson, Steve; Yurk, Jeffrey; Gray, David
Subject: RE: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 3 2015.docx

Wren: I have inserted the Inspection and Enforcement history into the document. This includes both EPA and State activities.

See attached.
Also attached is the ECHO report (FYI only).

Thank you,
Connie M. Overbay
Enforcement Coordinator (6EN)
Compliance Assurance and Enforcement Div.
Region 6
(214) 665-7274
(214) 665-7446 (fax)

From: Blevins, John
Sent: Friday, December 04, 2015 7:28 AM
To: Thompson, Steve; Overbay, Connie
Cc: Gilrein, Stephen; Yurk, Jeffrey
Subject: Fwd: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 3 2015.docx

FYI. See action plan. We have some items to work on. Please see if you can set up a call/mtg early next week with OHSA contacts to bring them up to speed.

Also reach out to HQ and get status update on their settlement discussion with DuPont. Does it include this facility?

Connie- can you please pull together inspection and enforcement history (all programs) for the facility. Hopefully you can include state actions in summary.

Thanks

John

Sent from my iPhone

Begin forwarded message:

From: "Stenger, Wren" <stenger.wren@epa.gov>
Date: December 3, 2015 at 5:26:34 PM EST
To: "Blevins, John" <Blevins.John@epa.gov>, "Seager, Cheryl" <Seager.Cheryl@epa.gov>, "Edlund, Carl" <Edlund.Carl@epa.gov>, "Garcia, David" <Garcia.David@epa.gov>, "Gilrein, Stephen" <gilrein.stephen@epa.gov>, "Gray, David" <gray.david@epa.gov>, "Harrison, Ben" <Harrison.Ben@epa.gov>, "Hill, Troy" <Hill.Troy@epa.gov>, "Honker, William" <honker.william@epa.gov>, "McDonald, James" <McDonald.James@epa.gov>, "Phillips, Pam" <phillips.pam@epa.gov>, "Smith, Rhonda" <smith.rhonda@epa.gov>, "Taheri, Diane" <Taheri.Diane@epa.gov>, "Blanco, Arturo" <Blanco.Arturo@epa.gov>, "Coleman, Sam" <Coleman.Sam@epa.gov>, "Curry, Ron" <Curry.Ron@epa.gov>
Cc: "Crossland, Ronnie" <Crossland.Ronnie@epa.gov>, "Yurk, Jeffrey" <yurk.jeffrey@epa.gov>, "Johnson, Lydia" <johnson.lydia@epa.gov>, "Verhalen, Frances" <verhalen.frances@epa.gov>, "Hansen, Mark" <Hansen.Mark@epa.gov>, "Casso, Ruben" <Casso.Ruben@epa.gov>, "Anderson, Israel" <Anderson.Israel@epa.gov>, "Runnels, Charlotte" <Runnels.Charlotte@epa.gov>, "Brown, Jamesr" <brown.jamesr@epa.gov>, "McGee, Tomika" <McGee.Tomika@epa.gov>
Subject: DuPont LaPlace LA Action Plan Chloroprene DRAFT Dec 3 2015.docx

All, here is the framework for the Action Plan we developed this afternoon. I added an OEJTA category with several items that we discussed and seemed important. Please input your program information. Add anything you think is missing.

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I will try to get this posted on a sharepoint for future editing, but for now, please get your input to me and copy Tomika McGee ASAP.

Thanks

Message

From: Thompson, Steve [thompson.steve@epa.gov]
Sent: 12/8/2015 1:26:40 PM
To: Gilrein, Stephen [gilrein.stephen@epa.gov]; Blevins, John [Blevins.John@epa.gov]
Subject: Fwd: Upcoming EPA National Air Toxics Assessment release and information regarding potential risks associated with Dupont facility in LaPlace, LA

Sent from my iPhone

Begin forwarded message:

From: "Thompson, Steve" <thompson.steve@epa.gov>
Date: December 7, 2015 at 4:04:57 PM CST
To: "cole.howard@dol.gov" <cole.howard@dol.gov>, Jeff Lewis <Lewis.Jeffrey@dol.gov>
Subject: Upcoming EPA National Air Toxics Assessment release and information regarding potential risks associated with Dupont facility in LaPlace, LA

Jeff and Howard,

I wanted to pass along the following information as an FYI to you all in case you all get questions regarding worker safety/exposures at the Dupont LaPlace, LA facility.

Please give me a call if you have any questions.

Hope all is well.
Steve

Steve Thompson
Branch Chief
Air Enforcement Branch
Compliance Assurance and Enforcement Division
U.S. EPA Region 6
Dallas, TX 75202
214-665-2769
thompson.steve@epa.gov

EPA has recently completed their 2011 National Air Toxics Assessment (NATA) and are scheduled to release their results on December 15th. As a heads-up to OSHA, they may want to look into on-site worker exposures to chloroprene (CAS # 126-99-8) at the Dupont facility in LaPlace, LA. The NATA study shows offsite cancer risks ranging from 1,800 to 3,000 in a million. EPA's regulatory level of concern ranged between 1 and 100 in a million. Emissions of chloroprene at the facility have not changed since the last NATA study was completed utilizing data from 2009, however in 2010, EPA determined that chloroprene was a likely human carcinogen and a Unit Risk Estimate was developed. Since, about 1/3 of the emissions are coming from fugitive emissions and sources like building exhaust fans, it would appear to be prudent to evaluate worker exposure. Below is a summary from the NATA study.

- <!--[if !supportLists]--><!--[endif]-->The 2011 NATA results, publically available at the census tract level, contain a tract with a cancer risk of 900-in-1 million.
- <!--[if !supportLists]--><!--[endif]-->In this tract, the census block driving the risk has a cancer risk of 1,800-in-1 million.
 - <!--[if !supportLists]--><!--[endif]-->Census block risks have been shared with state partners as part of the NATA review process; they will not be publically available.
- <!--[if !supportLists]--><!--[endif]-->The cancer risk of the census block/tract is mainly due to chloroprene emissions from a stationary point source, the Dupont facility, with a cancer risk of 1,800 to 3,000-in-1 million.
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 - <!--[if !supportLists]--><!--[endif]-->We are working with the facility on the modeling parameters and when the area sources are corrected, a census block receptor should be selected as the MIR receptor. This could result in facility risks of 3,000-in-1 million.
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 - <!--[if !supportLists]--><!--[endif]-->There are five current weight of evidence descriptors: carcinogenic to humans, likely to be carcinogenic to humans, suggestive evidence of carcinogenic potential, inadequate information to assess carcinogenic potential, and not likely to be carcinogenic to humans.
 - <!--[if !supportLists]--><!--[endif]-->Previously, EPA classified chloroprene as Group D, not classifiable as to human carcinogenicity, because of the absence of adequate data
- <!--[if !supportLists]--><!--[endif]-->The IRIS URE was used in the 2011 NATA, with a modification to account for chloroprene having a mutagenic mode of action. The actual value used was 0.00048 per $\mu\text{g}/\text{m}^3$.
- <!--[if !supportLists]--><!--[endif]-->Prior to 2010, chloroprene was not assessed for cancer risks because there was not a URE.
- <!--[if !supportLists]--><!--[endif]-->An IRIS RfC (0.02 mg/m^3) was also developed for chloroprene in 2010. The critical effects, seen in male and female mice and rats, include an increase of incidence in olfactory atrophy, alveolar hyperplasia, and splenic hematopoietic proliferation.

From: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Sent: 12/4/2015 1:04:01 PM
To: Gilrein, Stephen [gilrein.stephen@epa.gov]
Subject: Information for OSHA

Steve: EPA has recently completed their 2011 National Air Toxics Assessment (NATA) and are scheduled to release their results on December 15th. As a heads-up to OSHA, they may want to look into on-site worker exposures to chloroprene (CAS # 126-99-8) at the Dupont facility in LaPlace, LA. The NATA study shows offsite cancer risks ranging from 1,800 to 3,000 in a million. EPA's regulatory level of concern ranged between 1 and 100 in a million. Emissions of chloroprene at the facility have not changed since the last NATA study was completed utilizing data from 2009, however in 2010, EPA determined that chloroprene was a likely human carcinogen and a Unit Risk Estimate was developed. Since, about 1/3 of the emissions are coming from fugitive emissions and sources like building exhaust fans, it would appear to be prudent to evaluate worker exposure. Below is a summary from the NATA study.

Jeff

- The 2011 NATA results, publically available at the census tract level, contain a tract with a cancer risk of 900-in-1 million.
- In this tract, the census block driving the risk has a cancer risk of 1,800-in-1 million.
 - Census block risks have been shared with state partners as part of the NATA review process; they will not be publically available.
- The cancer risk of the census block/tract is mainly due to chloroprene emissions from a stationary point source, the Dupont facility, with a cancer risk of 1,800 to 3,000-in-1 million.
 - The cancer risk for this source is currently 1,800-in-1 million at a polar grid receptor. There are some large area sources overlapping census block receptors with higher risks, resulting in those census blocks not being chosen as the MIR receptor.
 - We are working with the facility on the modeling parameters and when the area sources are corrected, a census block receptor should be selected as the MIR receptor. This could result in facility risks of 3,000-in-1 million.
- An IRIS URE (0.0003 per $\mu\text{g}/\text{m}^3$) was developed for chloroprene in 2010. The assessment noted that chloroprene is "likely to be carcinogenic to humans."
 - There are five current weight of evidence descriptors: carcinogenic to humans, likely to be carcinogenic to humans, suggestive evidence of carcinogenic potential, inadequate information to assess carcinogenic potential, and not likely to be carcinogenic to humans.
 - Previously, EPA classified chloroprene as Group D, not classifiable as to human carcinogenicity, because of the absence of adequate data
- The IRIS URE was used in the 2011 NATA, with a modification to account for chloroprene having a mutagenic mode of action. The actual value used was 0.00048 per $\mu\text{g}/\text{m}^3$.
- Prior to 2010, chloroprene was not assessed for cancer risks because there was not a URE.
- An IRIS RfC (0.02 mg/m^3) was also developed for chloroprene in 2010. The critical effects, seen in male and female mice and rates, include an increase of incidence in olfactory atrophy, alveolar hyperplasia, and splenic hematopoietic proliferation.

Message

From: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Sent: 12/4/2015 1:23:59 PM
To: Gilrein, Stephen [gilrein.stephen@epa.gov]
Subject: DuPont Laplace 2014 Emissions Inventory
Attachments: DuPont LaPlace chloroprene major sources.xlsx

Steve: Attached is the 2014 LDEQ emissions inventory for chloroprene sources at the Dupont facility in LaPlace, LA. In summary about 24 tons are being emitted from area/fugitive sources such as building exhaust fans, 21 tons are being released from vents, and 84 tons are coming from stacks. Approximately half the emissions are coming from the top 4 to 5 sources, however in order to bring risk levels down to our typically evaluated regulatory levels of concern (1 to 100 in a million), the top 40 sources need to be evaluated.

Jeff

Message

From: Gilrein, Stephen [gilrein.stephen@epa.gov]
Sent: 11/19/2015 2:58:48 PM
To: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Subject: Re: Chloroprene

Can you model and see what communities are potentially?

Sent from my iPhone

On Nov 19, 2015, at 7:20 AM, "Yurk, Jeffrey" <yurk.jeffrey@epa.gov> wrote:

Steve: Attached are the emissions inventory pulls from Louisiana and Texas facilities for chloroprene. It appears the only facility where these emissions pose a risk concern is the DuPont facility in Laplace, LA. The emissions are coming primarily from uncontrolled vents and exhaust fans.

Jeff

<Chloroprene.xlsx>

Message

From: Gilrein, Stephen [gilrein.stephen@epa.gov]
Sent: 11/19/2015 3:48:04 PM
To: Yurk, Jeffrey [yurk.jeffrey@epa.gov]
Subject: Re: Chloroprene

Ok thanks

Sent from my iPhone

On Nov 19, 2015, at 9:37 AM, "Yurk, Jeffrey" <yurk.jeffrey@epa.gov> wrote:

Steve: The only facility worth looking at is the Dupont Laplace. Emissions from all other facilities are over 100 time less. We've already modeled all sources in the Region so we can put the new toxicity number in and see the impact.

Jeff

From: Gilrein, Stephen
Sent: Thursday, November 19, 2015 8:59 AM
To: Yurk, Jeffrey
Subject: Re: Chloroprene

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Sent from my iPhone

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<Chloroprene.xlsx>

Message

From: Gilrein, Stephen [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C08BD925669B48AC824210CE869FD17A-GILREIN, STEPHEN]
Sent: 12/7/2015 6:21:51 PM
To: Thompson, Steve [thompson.steve@epa.gov]
CC: Blevins, John [Blevins.John@epa.gov]
Subject: FW: Information for OSHA

Please share with OSHA; thanks.

From: Yurk, Jeffrey
Sent: Friday, December 04, 2015 7:04 AM
To: Gilrein, Stephen
Subject: Information for OSHA

Steve: EPA has recently completed their 2011 National Air Toxics Assessment (NATA) and are scheduled to release their results on December 15th. As a heads-up to OSHA, they may want to look into on-site worker exposures to chloroprene (CAS # 126-99-8) at the Dupont facility in LaPlace, LA. The NATA study shows offsite cancer risks ranging from 1,800 to 3,000 in a million. EPA's regulatory level of concern ranged between 1 and 100 in a million. Emissions of chloroprene at the facility have not changed since the last NATA study was completed utilizing data from 2009, however in 2010, EPA determined that chloroprene was a likely human carcinogen and a Unit Risk Estimate was developed. Since, about 1/3 of the emissions are coming from fugitive emissions and sources like building exhaust fans, it would appear to be prudent to evaluate worker exposure. Below is a summary from the NATA study.

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Message

From: Gilrein, Stephen [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C08BD925669B48AC824210CE869FD17A-GILREIN, STEPHEN]
Sent: 12/7/2015 6:20:37 PM
To: Stenger, Wren [stenger.wren@epa.gov]
Subject: FW: DuPont Laplace 2014 Emissions Inventory
Attachments: DuPont LaPlace chloroprene major sources.xlsx

FYI: I already sent this to David

From: Yurk, Jeffrey
Sent: Friday, December 04, 2015 7:24 AM
To: Gilrein, Stephen
Subject: DuPont Laplace 2014 Emissions Inventory

Steve: Attached is the 2014 LDEQ emissions inventory for chloroprene sources at the Dupont facility in LaPlace, LA. In summary about 24 tons are being emitted from area/fugitive sources such as building exhaust fans, 21 tons are being released from vents, and 84 tons are coming from stacks. Approximately half the emissions are coming from the top 4 to 5 sources, however in order to bring risk levels down to our typically evaluated regulatory levels of concern (1 to 100 in a million), the top 40 sources need to be evaluated.

Jeff

Message

From: Gilrein, Stephen [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C08BD925669B48AC824210CE869FD17A-GILREIN, STEPHEN]
Sent: 12/8/2015 5:47:22 PM
To: Thompson, Steve [thompson.steve@epa.gov]; Blevins, John [Blevins.John@epa.gov]
Subject: FW: DuPont Laplace 2014 Emissions Inventory
Attachments: DuPont LaPlace chloroprene major sources.xlsx

From: Yurk, Jeffrey
Sent: Friday, December 04, 2015 7:24 AM
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Jeff

Message

From: Gilrein, Stephen [gilrein.stephen@epa.gov]
Sent: 12/7/2015 5:44:00 PM
To: Gray, David [gray.david@epa.gov]
Subject: Fwd: DuPont Laplace 2014 Emissions Inventory
Attachments: DuPont LaPlace chloroprene major sources.xlsx; ATT00001.htm

Sent from my iPhone

Begin forwarded message:

From: "Yurk, Jeffrey" <yurk.jeffrey@epa.gov>
Date: December 4, 2015 at 7:23:59 AM CST
To: "Gilrein, Stephen" <gilrein.stephen@epa.gov>
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